

Thursday, December 22, 2005

Tennessee Regulatory Authority  
Attn: Chairman Ron Jones  
460 James Robertson Parkway  
Nashville, TN 37243-0505



**RE: Petition of Helping Hands Home Assistance, Inc. for 211 Utility Allocation in East Tennessee (Docket 05-00141)**

Dear Chairman Jones,

Please find enclosed for filing an original and 14 copies of Tennessee Alliance of Information & Referral Systems Petition to Intervene. Please date stamp one copy for my records.

Thank you for your assistance in this matter. If I may be of assistance please do not hesitate to contact me at 901-415-2718.

Sincerely,

Audrey May  
Vice President

TNAIRS  
PO Box 40752  
Nashville, TN 37204

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**December 22, 2005**

<b>IN RE:</b>	)	
	)	
<b>PETITION OF HELPING HANDS HOME</b>	)	<b>DOCKET NO.</b>
<b>ASSISTANCE, INC. FOR 211 UTILITY</b>	)	<b>05-00141</b>
<b>ALLOCATION IN EAST TENNESSEE</b>	)	

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**PETITION OF TENNESSEE ALLIANCE OF INFORMATION & REFERRAL  
SYSTEMS FOR LEAVE TO INTERVENE**

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The Tennessee Alliance of Information & Referral Systems ("TNAIRS"), whose members include United Ways of Tennessee, including the United Way of Metropolitan Nashville, and all current 2-1-1 providers in the state of Tennessee hereby petitions the Tennessee Regulatory Authority ("Authority") for leave to intervene pursuant to Tenn. Code Ann. § 4-5-3 10 (2005), Tenn. Code Ann. §65-2-107 (2004), and Tenn. Comp. R. & Regs. 1220-1-2-.08 (2005) in the referenced proceeding

In support of this petition, TNAIRS respectfully states the following

1 TNAIRS is a charitable not for profit corporation. TNAIRS' principle place of business is in Nashville, Tennessee. TNAIRS is a membership organization comprised of information & referral providers across the state, including comprehensive information & referral providers like 2-1-1 call centers and specialty information & referral providers like aging or disability call centers.

2. On December 13, 2004, TNAIRS, pursuant to its Petition for Designation as the State 2-1-1 Collaborative, was designated as the 2-1-1 Collaborative for the State of Tennessee by this Authority. As the designated 2-1-1 Collaborative, TNAIRS was charged with the responsibility for implementing a plan for 2-1-1 services in all parts of the State and for applying for State and Federal funding proposed by the Calling for 2-1-1 Act

3. TNAIRS has proposed such a Plan and it has been filed with this Authority in docket number 04-00342 "PETITION OF TENNESSEE ALLIANCE OF INFORMATION & REFERRAL SYSTEMS FOR 2-1-1 STATEWIDE COVERAGE." Said Petition provides for the provision of 2-1-1 service for the entire State of Tennessee, including the counties outlined in paragraph 4 below.

4. TNAIRS has become aware of an application of Helping Hands Home Assistance (HHHA), which seeks 2-1-1 Designation in eight counties in East Tennessee. Campbell, Claiborne, Cocke, Hamblen, Hancock, Monroe, Morgan, and Scott Counties.

4. TNAIRS has a direct interest in how 2-1-1 service is provided and believes HHHA does not have the experience or ability to provide quality information & referral

through the 2-1-1 dialing code. Further, TNAIRS believes that a statewide approach to the provision of 2-1-1 is the most efficient and practicable way to provide this very important service and that HHA's application or petition should be dismissed in favor of TNAIRS statewide plan.

5. TNAIRS moves to intervene in this matter in order to insure that its interests are represented as the State 2-1-1 Collaborative.

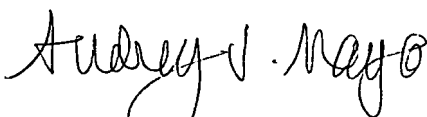
5. TNAIRS believes its Petition for Intervention is warranted and is being filed more than seven (7) days prior to the hearing of this matter.

6. The Petitioner's participation will not impair the interests of justice or the orderly prompt conduct of the Authority's proceeding.

WHEREFORE, TNAIRS respectfully requests that it be granted leave to intervene and participate in this proceeding with all attendant rights and responsibilities, including but not limited to the right to participate in any and all pre-hearing conferences, to produce and cross examine witnesses, to seek data requests and other discovery, and to file motions, briefs, testimony, and/or comments in order to assist the Authority's deliberations and otherwise protect the interests of TNAIRS and the public interest.

Additionally, Petitioner requests to receive copies of any notices, orders or any other documents filed herein, and have such other, further and general relief as the justice of their cause entitles them to receive.

Respectfully submitted,



**Audrey May**  
**TNAIRS Vice President**  
TNAIRS  
PO Box 40752  
Nashville, TN 37204  
901-415-2718